

**ORIGINAL****CIVIL SUIT NO.**20162965 **B CLERK AND RECORDER  
AVOYELLES PARISH LA****BRENON D. HUDSON AND  
AMANDA L. JACOBS**\* **12<sup>TH</sup> JUDICIAL DISTRICT COURT**  
FILE NO. **80**  
FILED AND RECORDED**VERSUS**\* **PARISH OF AVOYELLES****MICHAEL DALE GREENE,  
REDNECK, INC., NATIONAL UNION  
FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA. AND STATE  
FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY**\* **STATE OF LOUISIANA****PETITION FOR DAMAGES**

The petition of **BRENON D. HUDSON AND AMANDA L. JACOBS** both the full age of majority, residents of and domiciled in the Parish of Avoyelles, State of Louisiana, respectfully represents as follows, to-wit:

1.

Made defendants herein are:

**MICHAEL DALE GREENE, (VIA LONG ARM STATUTE)** who may be served at 878 Davis Street, Sulphur Springs, Texas 75482;

**REDNECK, INC., (VIA LONG ARM STATUTE)**, a limited liability corporation, licensed and doing business in the State of Texas who may be served through its agent for service of process, 1260 S. Hilcrest Street, Sulphur Springs, Texas 75483;

**NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.**, a foreign insurance company licensed to do and/or doing business in the State of Louisiana who may be served through its agent for service of process, Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, Louisiana 70809.

**STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY (UM of BRENON HUDSON)**, a foreign insurance company licensed to do and/or doing business in the State of Louisiana who may be served through its agent for service of process, Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, Louisiana 70809.

2.

Defendants are justly and truly indebted unto plaintiff herein, individually, jointly, severally and in solido in an amount commensurate with the damages occasioned, together with legal interest from the date of this demand and for all costs of these proceedings for the following enumerated reasons, to-wit:



3.

On or about July 1, 2015 plaintiff, **BRENON D. HUDSON**, was the owner and operator of a 1996 Crown Victoria, hereinafter be referred to as the "**HUDSON**" vehicle.

4.

On or about July 1, 2015 plaintiff, **AMANDA L. JACOBS**, was the owner and operator of a 2008 Mitsubishi Raider, hereinafter be referred to as the "**JACOBS**" vehicle.

5.

Defendant- driver, **MICHAEL DALE GREENE**, was the permitted operator of a 2013 Kenworth T440 owned by his employer **REDNECK, INC.**, hereinafter be referred to as the "**GREENE**" vehicle.

6.

At approximately 5:04 p.m., plaintiff, **BRENON HUDSON AND AMANDA L. JACOBS** were both at a complete stop in each of their own vehicles at the red light on North Preston Street. The **GREENE** vehicle attempted a right hand turn onto N. Preston Street and struck the **HUDSON AND JACOBS** vehicles, thus causing this accident.

7.

The acts or omissions of defendant-driver, **MICHAEL DALE GREENE** caused a collision, which resulted in plaintiffs sustaining severe personal injuries for which they had to seek medical treatment.

8.

As a result of the aforesaid vehicular collision, plaintiff **BRENNON HUDSON** has sustained personal injuries to his mind, head, neck, shoulders, back, arms and legs.

9.

As a result of the aforesaid vehicular collision, plaintiff **AMANDA L. JACOBS** has sustained personal injuries to her mind, head, neck, shoulders, back, arms and legs.

10.

At all times pertinent herein, plaintiff was free from fault in causing said accident; further, the said accident was solely and proximately caused by the negligence and/or strict liability of the defendant-drivers, **MICHAEL DALE GREENE**, whose acts of negligence and/or strict liability which include:

1. Driving a vehicle in an unsafe, reckless and dangerous manner;
2. Failing to be attentive and/or observe surrounding traffic;
3. Careless operation of a vehicle;
4. Failing to see what should have been seen; and
5. Failing to control his vehicle.

11.

As a result of the above and foregoing accident and resulting injuries **BRENON D. HUDSON AND AMANDA L. JACOBS**, have suffered the following damages: Pain and suffering (Past, present and future), Medical expenses (past, present and future), Mental anguish, humiliation and aggravation (past, present and future), loss of wages (past, present and future), property damage, towing and storage fees, penalties and attorney's fees for failure to timely adjust property damage, rental expenses and loss of enjoyment of life (past, present and future).

12.

At all times pertinent herein, defendant, **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**, was the liability insurer of **MICHAEL DALE GREENE AND/OR REDNECK, INC.**, pursuant to a policy of insurance issued covering the vehicle owned by **REDNECK, INC.** and operated

by **MICHAEL DALE GREENE**, the said insurance company is individually, jointly, severally, concurrently and in solido responsible for any and all damages set forth herein by virtue of its contractual obligation to insure said defendant.

13.

At all times pertinent herein, defendant, **STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY** was the uninsured/underinsured motorist insurer of **BRENON D. HUDSON** and pursuant to a policy of insurance issued covering the vehicle owned and operated by **BRENON HUDSON**, the said insurance company is individually, jointly, severally, concurrently and in solido responsible for any and all damages set forth herein by virtue of its contractual obligation to insure said defendant.

**WHEREFORE**, plaintiffs pray that their petition be deemed good and sufficient and that the same be served upon defendants herein, ordering them to answer the allegations contained; that after all due legal delays and proceedings are had, that there be judgment in favor of plaintiff, **BRENON D. HUDSON AND AMANDA L. JACOBS** and against defendants, **MICHAEL DALE GREENE, REDNECK, INC., NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA AND STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY** individually, jointly and in solido, in an amount commensurate with the damages enumerated hereinabove, together with legal interest from date of this demand and for all costs of these proceedings.

At this time, it is unknown if plaintiff's damages are sufficient to entitle any party to a trial by jury.

Plaintiff further prays for all general and equitable relief necessary herein.

Respectfully Submitted:

**LABORDE EARLES LAW FIRM, LLC.**

By:

**DERRICK G. EARLES (Bar #29570)  
DAVID C. LABORDE, (Bar# 20907)  
JEANNE M. LABORDE (Bar #24821)  
ANDREW B. MIMS (Bar #33990)  
SAMUEL J. SPURGEON (Bar #34773)  
SHAWN M. BORDELON (Bar #35049)**  
306 N. Washington Street  
P.O. Box 1559  
Marksville, Louisiana 71351  
Phone: (318) 253-3297  
Fax: (318) 253-7757  
***Attorney for Plaintiffs***

**SERVICE INFORMATION:**

**MICHAEL DALE GREENE, (VIA LONG ARM STATUTE)** who may be served at 878 Davis Street, Sulphur Springs, Texas 75482;

**REDNECK, INC., A/K/A (VIA LONG ARM STATUTE)**, a limited liability corporation, licensed and doing business in the State of Texas who may be served through its agent for service of process, 1260 S. Hilcrest Street, Sulphur Springs, Texas 75483;

**STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY (UM of BRENON HUDSON)**, a foreign insurance company licensed to do and/or doing business in the State of Louisiana who may be served through its agent for service of process, Louisiana Secretary of State, 8585 Archives Avenue, Baton Rouge, Louisiana 7080

**CIVIL SUIT NO. \_\_\_\_\_**

**BRENON D. HUDSON AND \* 12<sup>TH</sup> JUDICIAL DISTRICT COURT  
AMANDA L. JACOBS**

**VERSUS \* PARISH OF AVOYELLES**

**MICHAEL DALE GREENE, \* STATE OF LOUISIANA  
REDNECK, INC., NATIONAL UNION  
FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA. AND STATE  
FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY**

\*\*\*\*\*

**REQUEST FOR NOTICE**

\*\*\*\*\*

In accordance with the provisions of the Louisiana Code of Civil Procedure, you are hereby requested to give us written notice, by mail, ten (10) days in advance of the date fixed for trial of this case, whether on exceptions, rules or the merits thereof.

In accordance with the provisions of the Louisiana Code of Civil Procedure, you are also requested to send us immediate notice of any order of judgment made or rendered in this case, upon entry of such order of judgment.

Respectfully Submitted:

**LABORDE EARLES LAW FIRM, LLC.**

By

**DERRICK G. EARLES (Bar #29570)**

**DAVID C. LABORDE, (Bar# 20907)**

**JEANNE M. LABORDE (Bar #24821)**

**ANDREW B. MIMS (Bar #33990)**

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**SHAWN M. BORDELON (Bar #35049)**

306 N. Washington Street

P.O. Box 1559

Marksville, Louisiana 71351

Phone: (318) 253-3297

Fax: (318) 253-7757

**Attorney for Plaintiffs**

**CIVIL SUIT NO. \_\_\_\_\_**

**BRENON D. HUDSON AND \* 12<sup>TH</sup> JUDICIAL DISTRICT COURT  
AMANDA L. JACOBS**

**VERSUS \* PARISH OF AVOYELLES**

**MICHAEL DALE GREENE, \* STATE OF LOUISIANA  
REDNECK, INC., NATIONAL UNION  
FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA. AND STATE  
FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY**

**INTERROGATORIES**

**NOW COME** plaintiffs, **BRENON D. HUDSON AND AMANDA L. JACOBS**, through undersigned counsel, and propound to defendants, **MICHAEL DALE GREENE, REDNECK, INC., AND , NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**, the following interrogatories to be answered fully, individually, in writing, and under oath, under the provisions of the Louisiana Code of Civil Procedure, within 15 days of service hereof; and in default of the full, complete, and timely answer thereto, plaintiff demands that you pay all reasonable attorney's fees, costs, and expenses of compelling answer to the same.

These interrogatories cover all information available to the answering parties and to each and every agent, employee, and attorney of such party, whether by personal knowledge, hearsay, books, records, reports, and all other sources, and these interrogatories are continuing and the answers shall be supplemented or amended if further information becomes known to the answering party prior to the trial of this case.

**DEFINITIONS AND INSTRUCTIONS**

- A. "You" or "Yours" refers to the defendants or anyone acting on behalf of defendants.
- B. The term "person" shall mean, unless otherwise specified any natural person, firm, corporation, association, group or organization.
- C. The term "document" shall mean the original and any copy regardless of origin or location of any book, invoice, pamphlet, periodical, letter,

memorandum, schedule, telegram, report, record, study, hand written note, working paper, chart, paper, graph, index, date tape disc, data sheet, or data process card or any other written, recorded, transcribed, punched, taped, filmed or graphic material however produced or reproduced which you have or have had access to.

**INTERROGATORY NUMBER 1**

Please state the full name, address, job title and present employer of each person answering or assisting in answering these interrogatories on behalf of the defendants.

**INTERROGATORY NUMBER 2**

Please state the name and address of any all third parties which you contend caused or contributed to the accident which is the subject of this litigation.

**INTERROGATORY NUMBER 3**

Please state whether or not you have a copy of any statement which the plaintiffs have previously made concerning this action or its subject matter which is in your possession, custody or control. For the purpose of this question, a statement previously made includes a written statement signed or otherwise adopted or approved by the person making it to a stenographic mechanic electrical or other recorder; or a transcription thereof which is substantially verbatim recital of the oral statement by the person making it and contemporaneously recorded.

**INTERROGATORY NUMBER 4**

Please describe the insurance agreement which any insurance company may be liable to satisfy all or part of the judgment which may be entered in this action, or to indemnify or reimburse for payments made to satisfy the judgment by stating the name of the person or entity insured and the named of the insured, and the amount of liability insurance coverage.

**INTERROGATORY NUMBER 5**

Please advise as to all resident relatives who reside with **MICHAEL DALE GREENE** and list all vehicles owned by said relatives and list all insurance policies insuring said vehicles.

**INTERROGATORY NUMBER 6**

Please state any and all other acts of negligence which the defendants' may assert were committed by the plaintiffs, when this matter proceeds to trial.

**INTERROGATORY NUMBER 7**

Did the defendant, **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA**, provide automobile liability insurance coverage to **MICHAEL DALE GRENN AND REDNECK, INC.**? If so, please state the limits of said coverage.

**INTERROGATORY NUMBER 8**

Describe any umbrella or acts of liability coverage over and above the basic primary coverage that may be responsible for paying any part of this judgment against you in this case.

**INTERROGATORY NUMBER 9**

Do you contend that the plaintiffs have done anything or failed to do anything that constitutes a failure to mitigate damages? If so, please describe what your contention is based on and what evidence exists to support same.

**INTERROGATORY NUMBER 10**

What is the defendants' understanding or contention with respect to how the occurrence in question occurred, and how and why the plaintiff sustained her injuries?

**INTERROGATORY NUMBER 11**

Please state completely and fully all representations, statement, declarations or admissions made by, **MICHAEL DALE GREENE**, his agents or servants of his which you might attempt to make known to the judge or jury in the trial of this matter.

**INTERROGATORY NUMBER 12**

On July 1, 2015 prior to the accident, had the defendant, **MICHAEL DALE GREENE**, had any alcoholic beverages or any other mind altering substances, and if so, please state each and every alcoholic beverage consumed and/or each and every medication or other mind altering substance said to have been used by the defendant, **MICHAEL DALE GREENE**.

**INTERROGATORY NUMBER 13**

Was the defendant, **MICHAEL DALE GREENE** in the course and scope of his employment with any entity on the date of this accident and if so, please supply us with the name of the entity along with the address and telephone number and a copy of any insurance policies insuring this entity for any and all liability which may have resulted from their actions.

**INTERROGATORY NUMBER 14**

Please give us a list of every person with whom the defendant had contact, including address and telephone numbers for the three (3) hours prior to and for the three (3) hours following the accident.

**INTERROGATORY NUMBER 15**

Please state the location that **MICHAEL DALE GREENE** was coming from and going to at the time of the above mentioned accident.

**INTERROGATORY NUMBER 16**

Please state **MICHAEL DALE GREENE**'s date of birth, social security number and any other names **MICHAEL DALE GREENE** have gone by in his lifetime.

**INTERROGATORY NUMBER 17**

Describe in detail what damage, if any, was done to, **MICHAEL DALE GREENE AND/OR REDNECK, INC.**, vehicle in the collision and give the cost of repairs for both vehicles.

**INTERROGATORY NUMBER 18**

Describe any traffic citation **MICHAEL DALE GREENE** received as a result of this collision by stating the name and the location of the Court involved, the violations of the law charged in that citation, and the date, time, place and manner (i.e., type of plea, bail, forfeit, trial, etc.) of disposition of the citation.

**INTERROGATORY NUMBER 19**

Please list the name and address of each and every individual whom you may call to testify at the trial of this matter, stating whether this witness is an expert or lay witness and giving a brief description of the subject of his/her testimony.

**INTERROGATORY NUMBER 20**

State the name, address and telephone number of each and every investigator hired by the defendants to investigate any aspect of this case.

**INTERROGATORY NUMBER 21**

State the name, address and telephone number of each and every witness interviewed by any investigator or any attorney representing the defendant in connection with this case.

**INTERROGATORY NUMBER 22**

State the name and address of any and all persons from whom oral, verbal or written statements were taken by the defendants or any of their agents, and the date any such statement was given.

**INTERROGATORY NUMBER 23**

Please state each and every affirmative defense the defendants are asserting or may assert in defense of this matter.

These interrogatories are deemed continuing.

Respectfully Submitted:

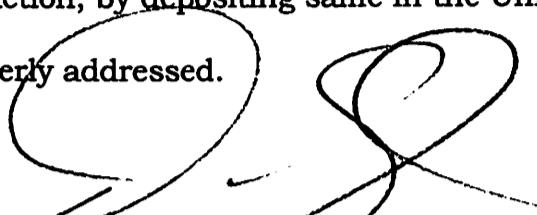
**LABORDE EARLES LAW FIRM, LLC.**

BY:

**DERRICK G. EARLES (Bar #29570)**  
**DAVID C. LABORDE, (Bar# 20907)**  
**JEANNE M. LABORDE (Bar #24821)**  
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306 N. Washington Street  
P.O. Box 1559  
Marksville, Louisiana 71351  
Phone: (318) 253-3297  
Fax: (318) 253-7757  
**Attorney for Plaintiffs**

**C E R T I F I C A T E**

I certify that on this 18<sup>th</sup> day of April, 2016, copies of the foregoing pleading, motion or notice and any related exhibit and memorandum, were served on all counsel of record in this action, by depositing same in the United States mails, postage prepaid and properly addressed.

  
**DERRICK G. EARLES**

CIVIL SUIT NO. \_\_\_\_\_

BRENON D. HUDSON AND \* 12<sup>TH</sup> JUDICIAL DISTRICT COURT  
AMANDA L. JACOBS

VERSUS \* PARISH OF AVOYELLES

MICHAEL DALE GREENE, \* STATE OF LOUISIANA  
REDNECK, INC., NATIONAL UNION  
FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA. AND STATE  
FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

\*\*\*\*\*  
**REQUEST FOR PRODUCTION OF DOCUMENTS**  
\*\*\*\*\*

Plaintiffs, **BRENON D. HUDSON AND AMANDA L. JACOBS**, hereby  
requests of defendant, **MICHAEL DALE GREENE, REDNECK, AND,**  
**NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA,**  
pursuant to the Rules of Civil Procedure, to produce the following documents  
at the law offices of Derrick G. Earles, The Laborde Law Firm, P.O. Box 1559,  
Marksville, Louisiana, within the delays provided by law the following:

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1**

Please provide the names, addresses and telephone numbers of all known  
witnesses at the time of the accident.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2**

Please provide a copy of all statements taken in this matter stating the names,  
addresses and telephone numbers of all persons from whom statements have  
been taken.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3**

Copies of all photographs taken in this matter.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4**

Original or certified copies of any and all policies of liability insurance,  
umbrella policies, or any other policies in existence providing liability coverage  
including information sheets, declaration sheets or any other documentation  
filled out by or concerning the coverage issued to **MICHAEL DALE GREENE**  
**AND/OR REDNECK, INC.**

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 5**

A copy of the defendants, **MICHAEL DALE GREENE** driving record, copy of his driver's license, a copy of the registration on his vehicle and a copy of his insurance policy including any umbrella policy which may exist.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6**

Please supply us with any and all maintenance records on the vehicle involved in the accident.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 7**

Copies of any statements of the plaintiff, **BRENON D. HUDSON AND/OR AMANDA L. JACOBS**, may have given in connection with this matter.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 8**

Copy of damage appraisal made on defendant's vehicle.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 9**

Any and all drawings, maps, or sketches of the scene of the accident which has been made the basis of this lawsuit.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 10**

Please produce any and all exhibits, documents, records, photographs, evidence or demonstrative evidence of any nature which you may introduce at the trial of this matter.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 11**

Please produce copies of any surveillance material, activity checks, and/or film conducted with reference to plaintiff herein.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 12**

Please produce a copy of the statements of any and all persons from whom oral, verbal or written statements were taken by the defendants or any of their agents.

**REQUEST FOR PRODUCTION OF DOCUMENTS NUMBER 13**

Please produce a copy of all bills, declaration sheets or any documentation sent to **REDNECK, INC.**, Insured for the entire period of time that the vehicle that was involved in this accident was insured by defendant, , **NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.**

Respectfully Submitted:

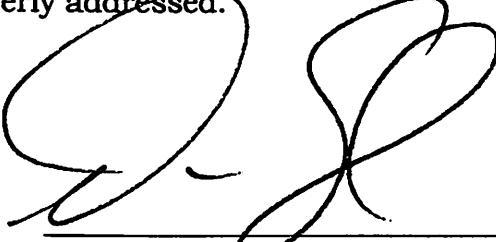
**LABORDE EARLES LAW FIRM, LLC.**

By:

**DERRICK G. EARLES (Bar #29570)**  
**DAVID C. LABORDE, (Bar# 20907)**  
**JEANNE M. LABORDE (Bar #24821)**  
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306 N. Washington Street  
P.O. Box 1559  
Marksville, Louisiana 71351  
Phone: (318) 253-3297  
Fax: (318) 253-7757  
**Attorney for Plaintiffs**

**C E R T I F I C A T E**

I certify that on this 18<sup>th</sup> day of April, 2016 copies of the foregoing pleading, motion or notice and any related exhibit and memorandum, were served on all counsel of record in this action, by depositing same in the United States mails, postage prepaid and properly addressed.

  
**DERRICK G. EARLES**

**CIVIL SUIT NO. \_\_\_\_\_**

**BRENON D. HUDSON AND \* 12<sup>TH</sup> JUDICIAL DISTRICT COURT  
AMANDA L. JACOBS**

**VERSUS \* PARISH OF AVOYELLES**

**MICHAEL DALE GREENE, \* STATE OF LOUISIANA  
REDNECK, INC., NATIONAL UNION  
FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA. AND STATE  
FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY**

\*\*\*\*\*

**INTERROGATORIES**

\*\*\*\*\*

**NOW COME** plaintiff, **BRENON D. HUDSON**, through undersigned counsel, and propound to defendant, **STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY**, the following interrogatories to be answered fully, individually, in writing, and under oath, under the provisions of the Louisiana Code of Civil Procedure, within 15 days of service hereof; and in default of the full, complete, and timely answer thereto, plaintiff demands that you pay all reasonable attorney's fees, costs, and expenses of compelling answer to the same.

**DEFINITIONS AND INSTRUCTIONS**

- A. "You" or "Yours" refers to the defendants or anyone acting on behalf of defendants.
- B. The term "person" shall mean, unless otherwise specified any natural person, firm, corporation, association, group or organization.
- C. The term "document" shall mean the original and any copy regardless of origin or location of any book, invoice, pamphlet, periodical, letter, memorandum, schedule, telegram, report, record, study, hand written note, working paper, chart, paper, graph, index, date tape disc, data sheet, or data process card or any other written, recorded, transcribed, punched, taped, filmed or graphic material however produced or reproduced which you have or have had access to.

**INTERROGATORY NO. 1**

Please state the full name, address, job title and present employer of each person answering or assisting in answering these interrogatories on behalf of the defendant.

**INTERROGATORY NO. 2**

Please state the name and address of any all third parties which you contend caused or contributed to the accident which is the subject of this litigation.

**INTERROGATORY NO. 3**

Please state whether or not you have a copy of any statement which the plaintiff has previously made concerning this action or its subject matter which is in your possession, custody or control. For the purpose of this question, a statement previously made includes a written statement signed or otherwise adopted or approved by the person making it to a stenographic mechanic electrical or other recorder; or a transcription thereof which is substantially verbatim recital of the oral statement by the person making it and contemporaneously recorded.

**INTERROGATORY NO. 4**

Please describe the insurance agreement which any insurance company may be liable to satisfy all or part of the judgment which may be entered in this action, or to indemnify or reimburse for payments made to satisfy the judgment by stating the name of the person or entity insured and the named of the insured, and the amount of liability insurance coverage.

**INTERROGATORY NO. 5**

Please state any and all other acts of negligence which the defendants' may assert were committed by the plaintiff when this matter proceeds to trial.

**INTERROGATORY NO. 6**

Did the defendant, **STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY**, provide uninsured/underinsured motorist and medical payment insurance coverage to plaintiff, **BRENON D. HUDSON**? If so, please state the limits of said coverage.

**INTERROGATORY NO. 7**

Describe any umbrella or acts of liability coverage over and above the basic primary coverage that may be responsible for paying any part of this judgment against you in this case.

**INTERROGATORY NO. 8**

Do you contend that the plaintiff has done anything or failed to do anything that constitutes a failure to mitigate damages? If so, please describe what your contention is based on and what evidence exists to support same.

**INTERROGATORY NO. 9**

What is the defendant's understanding or contention with respect to how the occurrence in question occurred, and how and why the plaintiff sustained his injuries?

**INTERROGATORY NO. 10**

Please state completely and fully all representations, statement, declarations or admissions made by plaintiff, **BRENON D. HUDSON**, agents or servants of their which you might attempt to make known to the judge or jury in the trial of this matter.

**INTERROGATORY NO. 11**

Please list the name and address of each and every individual whom you may call to testify at the trial of this matter, stating whether this witness is an expert or lay witness and giving a brief description of the subject of his/her testimony.

**INTERROGATORY NO. 12**

State the name, address and telephone number of each and every investigator hired by the defendants to investigate any aspect of this case.

**INTERROGATORY NO. 13**

State the name, address and telephone number of each and every witness interviewed by any investigator or any attorney representing the defendant in connection with this case.

**INTERROGATORY NO. 14**

State the name, address and telephone number of any person(s) who have conducted any surveillance films or activity checks on plaintiff, **BRENON D. HUDSON**.

**INTERROGATORY NO. 15**

State the name and address of any and all persons from whom oral, verbal or

written statements were taken by the defendants or any of their agents, and the date any such statement was given.

**INTERROGATORY NO. 16**

Please state each and every affirmative defense the defendant is asserting or may assert in defense of this matter.

These interrogatories are deemed continuing.

Respectfully Submitted:

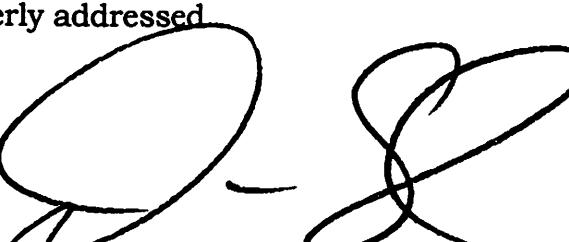
**LABORDE EARLES LAW FIRM, LLC.**

By:

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Phone: (318) 253-3297  
Fax: (318) 253-7757  
**Attorney for Plaintiffs**

**C E R T I F I C A T E**

I certify that on this 16 day of April, 2016, copies of the foregoing pleading, motion or notice and any related exhibit and memorandum, were served on all counsel of record in this action, by depositing same in the United States mails, postage prepaid and properly addressed

  
**DERRICK G. EARLES**

**CIVIL SUIT NO. \_\_\_\_\_**

**BRENON D. HUDSON AND \* 12<sup>TH</sup> JUDICIAL DISTRICT COURT  
AMANDA L. JACOBS**

**VERSUS \* PARISH OF AVOYELLES**

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REDNECK, INC., NATIONAL UNION  
FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA. AND STATE  
FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY**

**\*\*\*\*\* REQUEST FOR PRODUCTION OF DOCUMENTS \*\*\*\*\***

Plaintiff, **BRENON D. HUDSON**, hereby requests of defendant, **STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY**, pursuant to the Rules of Civil Procedure, to produce the following documents at the law offices of Derrick G. Earles, The Laborde Law Firm. P.O. Box 1559, Marksville, Louisiana, within the delays provided by law the following:

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1**

Please provide the names, addresses and telephone numbers of all known witnesses at the time of the accident.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2**

Please provide a copy of all statements taken in this matter stating the names, addresses and telephone numbers of all persons from whom statements have been taken.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 3**

Original or certified copies of any and all policies of uninsured/underinsured motorist insurance, umbrella policies, or any other policies in existence providing uninsured/underinsured motorist coverage including information sheets, declaration sheets or any other documentation filled out by or concerning the coverage issued to **BRENON D. HUDSON**

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 4**

Any and all drawings, maps, or sketches of the scene of the accident which has been made the basis of this lawsuit.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO.5**

Please produce any and all exhibits, documents, records, photographs, evidence or demonstrative evidence of any nature which you may introduce at the trial of this matter.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 6**

Please produce copies of any surveillance material, activity checks, and/or film conducted with reference to plaintiff herein.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 7**

Please produce a copy of the statements of any and all persons from whom oral, verbal or written statements were taken by the defendants or any of their agents.

**REQUEST FOR PRODUCTION OF DOCUMENTS NO. 8**

Please produce a copy of all bills, declaration sheets or any documentation sent to **BRENON D. HUDSON** for the entire period of time that the vehicle that was involved in this accident was insured by defendant, **STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY**.

Respectfully Submitted:

**LABORDE EARLES LAW FIRM, LLC.**

By:

**DERRICK G. EARLES (Bar #29570)**

**DAVID C. LABORDE, (Bar# 20907)**

**JEANNE M. LABORDE (Bar #24821)**

**ANDREW B. MIMS (Bar #33990)**

**SAMUEL J. SPURGEON (Bar #34773)**

**SHAWN M. BORDELON (Bar #35049)**

306 N. Washington Street

P.O. Box 1559

Marksville, Louisiana 71351

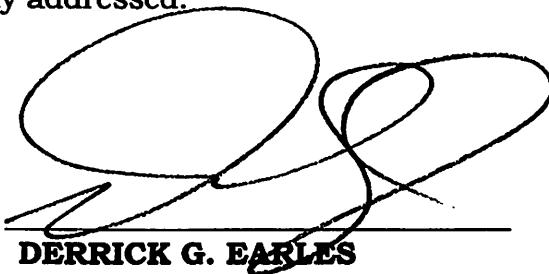
Phone: (318) 253-3297

Fax: (318) 253-7757

***Attorney for Plaintiff, Brenon Hudson***

**C E R T I F I C A T E**

I certify that on this 18<sup>th</sup> day of April, 2016 copies of the foregoing pleading, motion or notice and any related exhibit and memorandum, were served on all counsel of record in this action, by depositing same in the United States mails, postage prepaid and properly addressed.



DERRICK G. EARLES

CITATION

BRENON HUDSON, ET AL

Vs.

MICHAEL DALE GREENE, ET AL



Case: 2016-00002965

Division: B

12<sup>th</sup> Judicial District Court

Parish of Avoyelles

State of Louisiana

To: MICHAEL DALE GREENE  
878 DAVIS STREET  
SULPHUR SPRINGS, TX 75482

**YOU ARE HEREBY CITED to appear in the office of the Clerk of said Court, in the City of Marksville, Parish aforesaid and comply with the demand contained in the petition, of which a copy is hereto annexed, or make an appearance, in writing, by filing a pleading or otherwise in the Office of said Clerk within THIRTY (30) days after the service hereof, under penalty of default.**

**WITNESS the Honorable JUDGES of our said Court on Wednesday, April 20, 2016.**

O/P

Attorney  
DERRICK EARLES

Connie B. Couvillon

Clerk of Court

Deputy Clerk of Court

**SHERIFF'S RETURN**

**PERSONAL SERVICE**

*Received the above citation, a certified copy thereof, and a certified copy of the petition*

*Filed on* \_\_\_\_\_

*Date Served* \_\_\_\_\_

*In person to* \_\_\_\_\_

*Deputy Sheriff* \_\_\_\_\_

**DOMICILIARY SERVICE**

*Received this citation, a certified copy thereof, and a certified copy of the petition*

*Filed on* \_\_\_\_\_

*Date Served* \_\_\_\_\_

*Served to* \_\_\_\_\_

*A person apparently above the age of sixteen years residing at the said domicile as a member thereof from which, at the time of said service, the above named individual was absent.*

*Deputy Sheriff* \_\_\_\_\_

CITATION

BRENON HUDSON, ET AL

Vs.

MICHAEL DALE GREENE, ET AL



Case: 2016-00002965  
Division: B  
12<sup>th</sup> Judicial District Court  
Parish of Avoyelles  
State of Louisiana

To: REDNECK, INC  
1260 S. HILCREST STREET  
SULPHUR SPRINGS, TX 75483

**YOU ARE HEREBY CITED to appear in the office of the Clerk of said Court, in the City of Marks ville, Parish aforesaid and comply with the demand contained in the petition, of which a copy is hereto annexed, or make an appearance, in writing, by filing a pleading or otherwise in the Office of said Clerk within THIRTY (30) days after the service hereof, under penalty of default.**

**WITNESS the Honorable JUDGES of our said Court on Wednesday, April 20, 2016.**

O/P

Attorney  
DERRICK EARLES

Connie B. Couvillon  
Clerk of Court  
Vince D. S. —  
Deputy Clerk of Court

**SHERIFF'S RETURN**

**PERSONAL SERVICE**

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**Filed on** \_\_\_\_\_

**Date Served** \_\_\_\_\_

**In person to** \_\_\_\_\_

**Deputy Sheriff** \_\_\_\_\_

**DOMICILIARY SERVICE**

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**Served to** \_\_\_\_\_

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**Deputy Sheriff** \_\_\_\_\_

CITATION

BRENON HUDSON, ETAL

Vs.

MICHAEL DALE GREENE, ETAL



Case: 2016-00002965  
Division: B  
12<sup>th</sup> Judicial District Court  
Parish of Avoyelles  
State of Louisiana

To: STATE FARM MUTUAL AUTOMOBILE INS CO(UM FOR BRENON HUDSON)  
THROUGH TOM SCHEDLER  
8585 ARCHIVES AVE  
BATON ROUGE, LA 70809

**YOU ARE HEREBY CITED to appear in the office of the Clerk of said Court, in the City of Marksville, Parish aforesaid and comply with the demand contained in the petition, of which a copy is hereto annexed, or make an appearance, in writing, by filing a pleading or otherwise in the Office of said Clerk within FIFTEEN (15) days after the service hereof, under penalty of default.**

**WITNESS** the Honorable **JUDGES** of our said Court on Wednesday, April 20, 2016.

O/P

Attorney  
DERRICK EARLES

Connie B. Couvillon  
Clerk of Court

Deputy Clerk of Court

**SHERIFF'S RETURN**

**PERSONAL SERVICE**

*Received the above citation, a certified copy thereof, and a certified copy of the petition*

**Filed on** \_\_\_\_\_

**Date Served** \_\_\_\_\_

**In person to** \_\_\_\_\_

**Deputy Sheriff** \_\_\_\_\_

**DOMICILIARY SERVICE**

*Received this citation, a certified copy thereof, and a certified copy of the petition*

**Filed on** \_\_\_\_\_

**Date Served** \_\_\_\_\_

**Served to** \_\_\_\_\_

*A person apparently above the age of sixteen years residing at the said domicile as a member thereof from which, at the time of said service, the above named individual was absent.*

**Deputy Sheriff** \_\_\_\_\_

**CITATION****BRENON HUDSON, ET AL****Vs.****MICHAEL DALE GREENE, ET AL**

**Case: 2016-00002965  
Division: B  
12<sup>th</sup> Judicial District Court  
Parish of Avoyelles  
State of Louisiana**

**To: STATE FARM MUTUAL AUTOMOBILE INS CO(UM FOR BRENON HUDSON)  
THROUGH TOM SCHEDLER  
8585 ARCHIVES AVE  
BATON ROUGE, LA 70809**

**RECEIVED  
APR 26 2016  
E.R. SHERIFF'S OFFICE**

**YOU ARE HEREBY CITED to appear in the office of the Clerk of said Court, in the City of Marksville, Parish aforesaid and comply with the demand contained in the petition, of which a copy is hereto annexed, or make an appearance, in writing, by filing a pleading or otherwise in the Office of said Clerk within FIFTEEN (15) days after the service hereof, under penalty of default.**

**WITNESS the Honorable JUDGES of our said Court on Wednesday, April 20, 2016.**

*Connie B. Couvillon*  
Clerk of Court

*Timothy R. B. Ray*  
Deputy Clerk of Court

**O/R**

**Attorney  
DERRICK EARLES**

**SHERIFF'S RETURN****PERSONAL SERVICE**

**Received the above citation, a certified copy thereof, and a certified copy of the petition**

**Filed on** \_\_\_\_\_

**Date Served** \_\_\_\_\_

**In person to** \_\_\_\_\_

**Deputy Sheriff** \_\_\_\_\_

**DOMICILIARY SERVICE** I made service on the named party through the

Office of the Secretary of State on

**Received this citation, a certified copy thereof, and a certified copy of the petition**

**APR 27 2016**

**Filed on** \_\_\_\_\_

by tendering a copy of this document to

**ANGIE GILL**

**DY. B. JAMES #0283**

Deputy Sheriff, Parish of East Baton Rouge, Louisiana

**Served to** \_\_\_\_\_

*A person apparently above the age of sixteen years residing at the said domicile as a member thereof from which, at the time of said service, the above named individual was absent.*

**Deputy Sheriff** \_\_\_\_\_

BOOK \_\_\_\_\_ PAGE ✓

CIVIL SUIT NO. 2016-2965-B  
BRENON D. HUDSON AND \* 12<sup>TH</sup> JUDICIAL DISTRICT COURT  
AMANDA L. JACOBS CLERK AND RECORDER  
AVOYELLES PARISH LA

VERSUS

**ORIGINAL**

MICHAEL DALE GREENE, \*  
REDNECK, INC., NATIONAL UNION  
FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA. AND STATE  
FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

PARISH OF AVOYELLES

STATE OF LOUISIANA FILED AND RECORDED

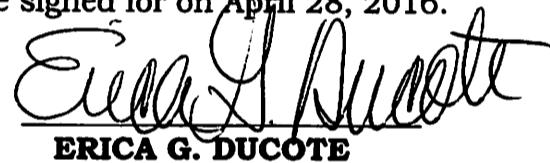
2016 MAY 5 PM 2 18

FILE NO (AKS)

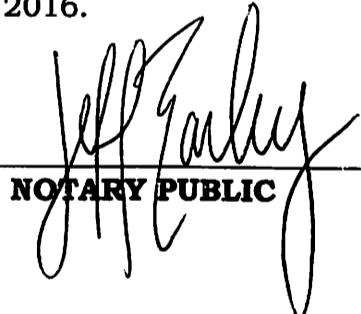
\*\*\*\*\*

**AFFIDAVIT OF SERVICE**

\*\*\*\*\*  
BEFORE ME, the undersigned Notary Public, personally appeared,  
ERICA G. DUCOTE who, after being duly sworn, did depose that on April 21,  
2016 she did deposit in the United States Mail in an envelope properly addressed  
to Redneck Inc., with sufficient postage affixed, a certified copy of the original  
petition filed by plaintiffs. A copy of the transmittal letter and the return receipt  
showing delivery to the defendant herein is attached hereto and made a part  
hereof. The certified letter and enclosures were signed for on April 28, 2016.

  
ERIC G. DUCOTE

SWORN TO AND SUBSCRIBED before me, the undersigned Notary Public,  
on this the 4 day of May, 2016.

  
NOTARY PUBLIC

JEFF D. EASLEY  
NOTARY PUBLIC  
BAR ROLL NO. 34170  
STATE OF LOUISIANA



**CITATION.**

BRENON HUDSON, ET AL

Vs.

MICHAEL DALE GREENE, ET AL



Case: 2016-00002965  
Division: B  
12<sup>th</sup> Judicial District Court  
Parish of Avoyelles  
State of Louisiana

To: REDNECK, INC  
1260 S. HILCREST STREET  
SULPHUR SPRINGS, TX 75483

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**WITNESS the Honorable JUDGES of our said Court on Wednesday, April 20, 2016.**

Connie B. Couvillon  
Clerk of Court

O/P  
Deputy Clerk of Court

Attorney  
DERRICK EARLES

**SHERIFF'S RETURN**

**PERSONAL SERVICE**

*Received the above citation, a certified copy thereof, and a certified copy of the petition*

*Filed on* \_\_\_\_\_

*Date Served* \_\_\_\_\_

*In person to* \_\_\_\_\_

*Deputy Sheriff* \_\_\_\_\_

**DOMICILIARY SERVICE**

*Received this citation, a certified copy thereof, and a certified copy of the petition*

*Filed on* \_\_\_\_\_

*Date Served* \_\_\_\_\_

*Served to* \_\_\_\_\_

*A person apparently above the age of sixteen years residing at the said domicile as a member thereof from which, at the time of said service, the above named individual was absent.*

*Deputy Sheriff* \_\_\_\_\_



1260 S. Hillcrest Drive • Sulphur Springs, Texas 75482-6602  
P.O. Box 2000 • P.O. Box 17 • (318) 233-5700 • FAX (318) 233-5704

April 21, 2016

P.J. LABORDE, JR. (JUDGE, 3<sup>rd</sup> CIR., RETIRED)  
DAVID C. LABORDE  
DERRICK G. EARLES  
JEANNE M. LABORDE  
FRANCES GOSEN O'NEAL  
ANDREW B. MIMS  
SAMUEL J. SPURGEON

DIRECT DIAL: (318) 233-3292  
[DIGGER@ONMYSIDE.COM](mailto:DIGGER@ONMYSIDE.COM)

RedNeck, Inc.  
1260 S. Hillcrest Drive  
Sulphur Springs, Texas 75482-6602

**Certified Return Receipt Requested**  
**9414711899563742026422**

**RE: Brenon Hudson, et al v Michael D. Greene, et al  
Civil Suit No.: 2016-2965-B**

Dear Sir:

In accordance with LSA-R.S. 13:3201, et seq., I enclose a Petition for Damages along with the attached Citation which I serve on you pursuant to the Louisiana Long Arm Statute.

Please be advised that you have thirty (30) days in which to file responsive pleadings in this regard.

With kindest regards,

**LABORDE EARLES LAW FIRM, LLC**

BY:   
**DERRICK G. EARLES**

DGE\erd  
Enclosures

OnMySide.com

1260 S. Hillcrest Drive  
Sulphur Springs, Texas 75482-6602

LAFAYETTE, LA  
(337) 233-5700

MONROEVILLE, AL  
(334) 933-5207

Sender:

Erica Ducote  
Laborde Earles Law Firm, LLC.  
P.O. Box 1559  
Marksville La 71351

**CERTIFIED MAIL**

9414 7118 9956 3742 0264 22

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**stamps.com**

**CERTIFIED MAIL**

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature: ( Addressee or  Agent)

X

B. Received By: (Please Print Clearly)

C. Date of Delivery

D. Addressee's Address (or Different From Address Used by Sender.)

Secondary Address / Suite / Apt. / Floor (Please Print Clearly)

Delivery Address

City \_\_\_\_\_ State \_\_\_\_\_ ZIP + 4 Code \_\_\_\_\_

\*Phone 5373-777\*  
\*1-UP Laser Form \*  
\*MUSA CMF-124 (02/04)\*

RECORDED

**CERTIFIED MAIL**

PS Form 3800 6/62



9414 7118 9956 3742 0264 22

RETURN RECEIPT REQUESTED  
Article Addressed To:

Redneck, Inc.  
1260 S. Hillcrest Dr  
Sulphur Springs TX 75482-6602

Redn  
1260  
Sulp

**CERTIFIED MAIL**

Erica Ducote  
L'abordé Earles Law Firm, LLC.  
P.O. Box 1559  
Marksville La 71351

PS Form 3800 6/02

<b>COMPLETE THIS SECTION ON DELIVERY</b>		
A. Signature: / ( <input type="checkbox"/> Addressee or <input type="checkbox"/> Agent ) <b>X</b> <i>Kaleb Gee</i>		
B. Received By: (Please Print Clearly) <i>Kaleb Gee</i>		
C. Date of Delivery <i>4/28/14</i>		
D. Addressee's Address (If Different From Address Used by Sender)		
Secondary Address / Suite / Apt. / Floor (Please Print Clearly)		
Delivery Address		
City	State	ZIP + 4 Code



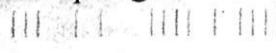
9414 7118 9956 3742 0264 22

**RETURN RECEIPT REQUESTED**

Article Addressed To:



Redneck, Inc.  
1260 S. Hillcrest Dr  
Sulphur Springs TX 75482-6602


CLERK AND RECORDER  
AVOYELLES PARISH LA  
**CIVIL SUIT NO. 2016-2965-B**

BRENON D. HUDSON AND <sup>2016 MAY</sup> 5 PM <sup>22<sup>nd</sup></sup> JUDICIAL DISTRICT COURT 2 18  
AMANDA L. JACOBS

VERSUS

**ORIGIN**FILE NO. AKS  
CLERK AND RECORDER

PARISH OF AVOYELLES AND RECORDED

**MICHAEL DALE GREENE,  
REDNECK, INC., NATIONAL UNION  
FIRE INSURANCE COMPANY  
OF PITTSBURGH, PA. AND STATE  
FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY**

\* STATE OF LOUISIANA

\*\*\*\*\*

**AFFIDAVIT OF SERVICE**

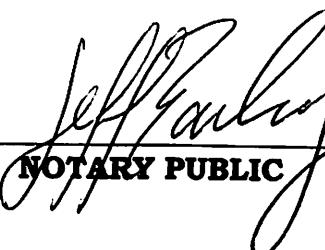
\*\*\*\*\*

BEFORE ME, the undersigned Notary Public, personally appeared,  
ERICA G. DUCOTE who, after being duly sworn, did depose that on April 21,  
2016 she did deposit in the United States Mail in an envelope properly addressed  
to Mr. Michael Greene with sufficient postage affixed, a certified copy of the  
original petition filed by plaintiffs. A copy of the transmittal letter and the  
return receipt showing delivery to the defendant herein is attached hereto and  
made a part hereof. The certified letter and enclosures were signed for on April  
27, 2016.



ERIC G. DUCOTE

SWORN TO AND SUBSCRIBED before me, the undersigned Notary Public,  
on this the 4 day of May, 2016.



NOTARY PUBLIC

JEFF D. EASLEY  
NOTARY PUBLIC  
BAR ROLL NO. 34170  
STATE OF LOUISIANA



**CITATION**

BRENON HUDSON, ET AL

Vs.

MICHAEL DALE GREENE, ET AL



Case: 2016-00002965  
Division: B  
12<sup>th</sup> Judicial District Court  
Parish of Avoyelles  
State of Louisiana

To: MICHAEL DALE GREENE  
878 DAVIS STREET  
SULPHUR SPRINGS, TX 75482

**YOU ARE HEREBY CITED to appear in the office of the Clerk of said Court, in the City of Marksville, Parish aforesaid and comply with the demand contained in the petition, of which a copy is hereto annexed, or make an appearance, in writing, by filing a pleading or otherwise in the Office of said Clerk within THIRTY (30) days after the service hereof, under penalty of default.**

**WITNESS the Honorable JUDGES of our said Court on Wednesday, April 20, 2016.**

O/P

Attorney  
DERRICK EARLES

Connie B. Couvillon

*[Signature]*  
Clerk of Court

Deputy Clerk of Court

**SHERIFF'S RETURN**

**PERSONAL SERVICE**

**Received the above citation, a certified copy thereof, and a certified copy of the petition**

**Filed on** \_\_\_\_\_

**Date Served** \_\_\_\_\_

**In person to** \_\_\_\_\_

**Deputy Sheriff** \_\_\_\_\_

**DOMICILIARY SERVICE**

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**Date Served** \_\_\_\_\_

**Served to** \_\_\_\_\_

*A person apparently above the age of sixteen years residing at the said domicile as a member thereof from which, at the time of said service, the above named individual was absent.*

**Deputy Sheriff** \_\_\_\_\_



• P.J. LABORDE, JR. (JUDGE, 8<sup>TH</sup> CIR., RETIRED)  
• DAVID C. LABORDE  
• DERRICK G. EARLES  
• JEANNE M. LABORDE  
• FRANCES GOSSEN O'NEAL  
• ANDREW B. MIMS  
• SAMUEL J. SPURGEON

P.J. LABORDE, JR. (JUDGE, 8<sup>TH</sup> CIR., RETIRED)

DAVID C. LABORDE

DERRICK G. EARLES

JEANNE M. LABORDE

FRANCES GOSSEN O'NEAL

ANDREW B. MIMS

SAMUEL J. SPURGEON

*DIRECT DIAL: (318) 253-3292*

*DIGGER@ONMYSIDE.COM*

April 21, 2016

Mr. Michael D. Greene  
878 Davis Street  
Sulphur Springs, Texas 75482

**Certified Return Receipt Requested**  
**9414711899563742029010**

**RE: Brenon Hudson, et al v Michael D. Greene, et al  
Civil Suit No.: 2016-2965-B**

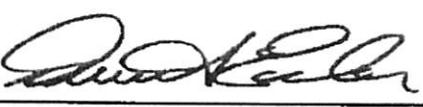
Dear Sir:

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Please be advised that you have thirty (30) days in which to file responsive pleadings in this regard.

With kindest regards,

**LABORDE EARLES LAW FIRM, LLC**

BY:   
**DERRICK G. EARLES**

DGE\erd  
Enclosures

OnMySide.com

(318) 253-3297

(318) 253-3297

(318) 253-3297

Sender:

Erica Ducote  
Laborde Earles Law Firm, LLC.  
P.O. Box 1559  
Marksville La 71351

CERTIFIED MAIL



9414 7118 9956 3742 0290 10

COMPLETE THIS SECTION ON DELIVERY

A. Signature: ( Addressee or  Agent)

X

B. Received By: (Please Print Clearly)

C. Date of Delivery

D. Addressee's Address (If Different From Address Used by Sender)

Secondary Address / Suite / Apt. / Floor (Please Print Clearly)

Delivery Address

City \_\_\_\_\_ State \_\_\_\_\_ ZIP + 4 Code \_\_\_\_\_

RETURN RECEIPT REQUESTED

Article Addressed To:



Mr Michael D. Greene  
878 Davis street S  
Sulphur Springs TX 75482-4310

CERTIFIED MAIL

stamps.com

\*Penna 5.575.277+  
\*5.607.619.935.631.09+  
\*1.1.1.P Laser Form #  
\*M-USA-CMP-154 06/15/4

CERTIFIED MAIL

CERTIFIED  
MAIL  
stamps.com

Erica Ducote  
Laborde Earles Law Firm, LLC.  
P.O. Box 1559  
Marksville La 71351

PS Form 3800

## COMPLETE THIS SECTION ON DELIVERY

A. Signature:  Addressee or  AgentX Michael Greene

B. Received By: (Please Print Clearly)

Michael Greene

C. Date of Delivery

4-27-16 no

D. Addressee's Address (If Different From Address Used by Sender)

Secondary Address / Suite / Apt. / Floor (Please Print Clearly)

Delivery Address

City

State

ZIP + 4 Code

\*5697 648 5848 809 \*  
\*LUP Laser Form \*  
\* USA CMF-154 05/15 \*



9414 7118 9956 3742 0290 10

## RETURN RECEIPT REQUESTED

Article Addressed To:

Mr Michael D. Greene  
878 Davis street S  
Sulphur Springs TX 75482-4310

CLERK AND RECORDER  
AVOYELLES PARISH LA

**LEAH B. GUILBEAU & ASSOCIATES**

**ATTORNEYS AT LAW**

2016 MAY 23 AM 9 59

Leah B. Guilbeau  
Timothy A. Maragos  
Jackson B. Bolinger  
Bridget R. Broussard  
James E. Diaz, Jr.

Employees of the Law Department  
State Farm Mutual Automobile Insurance Company

FILE NO. \_\_\_\_\_  
FILED AND RECORDED

4023 Ambassador Caffery Parkway, Suite 100  
Lafayette, Louisiana 70503

Joseph T. Puecker  
L. Bianca Chretien  
Brandon O. Wallace  
Jessica N. Clement

Telephone: (337) 988-7240  
Fax: (855) 396-2577

May 18, 2016

Clerk of Court  
12th Judicial District Court  
Post Office Box 219  
Marksville, LA 71351

Re: Brenon D. Hudson et al vs. Michael D. Greene, et al  
Docket No. 20162965

Dear Clerk:

Enclosed please find an Answer to Petition for Damages and Request for Notice of Trial Date for filing in the above referenced suit record. Also enclosed you will find an Order which we would ask that you present to the appropriate judge for execution, thereafter filing same in the suit record. Please return the enclosed photocopy of the pleadings stamped with the appropriate filing information. We have enclosed our check in the amount of \$300.00 to cover the filing fee.

Thank you for your assistance.

Very truly yours,

LEAH B. GUILBEAU & ASSOCIATES

*L. Bianca Chretien*

L. Bianca Chretien

LBC:lh

Enclosures

cc: Derrick G. Earles

ment 1-6 Filed  
+2(mE)

BRENON D. HUDSON, ET AL.

12TH JUDICIAL DISTRICT COURT

## VERSUS

DOCKET NO: 20162965 B

## BOOK

- PAGE

MICHAEL DALE GREENE, ET AL.

**PARISH OF AVOYELLES, LOUISIANA**

**CLERK AND REC'DR**

**ANSWER**

2016 MAY 23 AM 10 00

NOW INTO COURT, through undersigned counsel comes defendant, STATE FARM  
FILE NO. *(Handwritten)*  
MUTUAL AUTOMOBILE INSURANCE COMPANY, who for answer to the petition of  
FILED AND RECORDED  
AMANDA L. JACOBS AND BRENON D. HUDSON, respectfully denies each and every  
allegation as contained therein except as may be hereinafter admitted, and now further answering  
with specificity respectfully represents the following:

1

Save and except to admit the status of this answering defendant, any and all other allegations contained in and/or purported to be contained in Paragraph 1 are denied.

?

The allegations of paragraph 2 are denied.

3

The allegations of paragraph 3 are denied for lack of sufficient information to justify a belief therein.

4

The allegations of paragraph 4 are denied for lack of sufficient information to justify a belief therein.

5

The allegations of paragraph 5 are denied for lack of sufficient information to justify a belief therein.

6

The allegations of paragraph 6 are denied for lack of sufficient information to justify a belief therein.

7

The allegations of paragraph 7 are denied for lack of sufficient information to justify a belief therein.

1

The allegations of paragraph 8 are denied for lack of sufficient information to justify a belief therein.

9

The allegations of paragraph 9 are denied for lack of sufficient information to justify a belief therein.

10.

The allegations of paragraph 10 are denied for lack of sufficient information to justify a belief therein.

11.

The allegations of paragraph 11 are denied for lack of sufficient information to justify a belief therein.

12.

Paragraph 12 does not require an answer on behalf of this answering defendant. To the extent that it may, it is admitted that National Union Fire Insurance Company of Pittsburgh had in full force and effect a policy of liability insurance that provided coverage to the vehicle owned by Redneck Inc., and being operated by Michael Greene. It is further admitted that said policy would be primary to any policy provided by State Farm Mutual Automobile Insurance Company

13.

It is admitted that STATE FARM provided a policy of automobile liability insurance, which provided uninsured/underinsured motorist coverage to Brenon Hudson. However, said policy is a written contract and, as such, is the best evidence of its terms and contents, and said policy contains many definitions, limitations, exclusions, and defenses, all of which are incorporated herein by reference as if copied *in extenso*, otherwise, any and all other allegations contained in and/or purported to be contained in Paragraph 13 are denied.

AND NOW FURTHER ANSWERING:

14.

It is affirmatively alleged that the plaintiffs have or may have received payment of medical expenses under a policy or policies of health, accident, or medical and/or hospitalization insurance, Medicare or Medicaid benefits, and/or at a Charity Hospital, and have subrogated their rights and/or claims for payment of said expenses to the person, firm, corporation, or entity issuing said policy or benefits, and therefore has no right of action against this defendant for the amounts so paid.

15.

STATE FARM pleads a credit for any and all payments made to and/or on behalf of the plaintiffs, for any claims presented in this lawsuit, as well as for any and all underlying policies of insurance which may apply to the plaintiffs' claims.

16.

STATE FARM furthermore affirmatively avers that any potential liability for the payment of UM benefits will only accrue if and when the plaintiffs establish a claim through the submission of a satisfactory proof of loss, which proof of loss has not yet been provided by or on behalf of the plaintiffs.

17.

It is affirmatively averred that any and all injuries allegedly sustained by the plaintiff, BRENON HUDSON and AMANDA JACOBS, as a result of the accident in question, are actually the result of preexisting conditions and not the result of this motor vehicle accident.

18.

Plaintiffs have failed to mitigate their damages by failing to undergo recommended medical treatment and/or by failing to obtain medical treatment in a reasonably timely fashion following the accident.

19.

Defendant hereby prays for a trial by jury on all issues as allowed by law.

WHEREFORE, Defendant prays that this answer be deemed to be good and sufficient and that after all due proceedings have been completed that judgment be rendered in favor of this Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, in its capacity as the uninsured/underinsured motorist carrier, and against the Plaintiffs, BRENON HUDSON and AMANDA JACOBS, dismissing Plaintiffs' demands at their cost and for all other general and equitable relief in the premises.

DEFENDANT FURTHER PRAYS for a credit for any and all payments made to and/or on behalf of plaintiffs, for any claim presented in this lawsuit, as well as for any and all underlying policies of insurance which may apply to the plaintiffs' claims.

DEFENDANT FURTHER PRAYS for a trial by jury on all issues so triable.

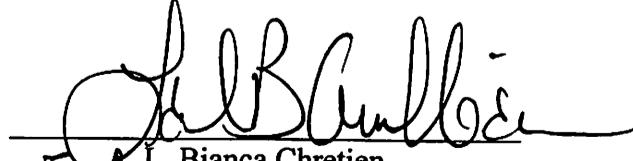
Respectfully submitted:

LEAH B. GUILBEAU & ASSOCIATES

By   
For L. Bianca Chretien  
Bar No. 29123  
Caffery Plaza, Suite 100  
4023 Ambassador Caffery Parkway  
Lafayette, Louisiana 70503  
Telephone: (337) 988-7240  
Attorney for defendant, State Farm Mutual  
Automobile Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon all counsel of record by placing same in the United States mail, postage prepaid and properly addressed, this 18<sup>th</sup> day of May, 2016.

  
For L. Bianca Chretien

ORIGINAL

BOOK \_\_\_\_\_ PAGE \_\_\_\_\_

BRENON D. HUDSON, ET AL

12TH JUDICIAL DISTRICT COURT  
CLERK AND RECORDER  
AVOYELLES PARISH LA

VERSUS

DOCKET NO: 20162965 2016 MAY 23 AM 10 00

MICHAEL DALE GREENE, ET AL

PARISH OF AVOYELLES, LOUISIANA

FILED AND RECORDED

\* \* \* \* \*

**REQUEST FOR NOTICE OF TRIAL DATE, ETC.**

TO THE CLERK OF COURT of the 12th Judicial District Court in and for the Parish of Avoyelles, Louisiana:

Please take notice that L. BIANCA CHRETIEN, attorney for STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, does hereby request written notice of the date of trial of the above matter as well as notice of hearings (whether on merits or otherwise), orders, judgments and interlocutory decrees, and any and all formal steps taken by the parties herein, the Judge or any member of Court, as provided in Louisiana Code of Civil Procedure of 1960, particularly Articles 1572, 1913 and 1914.

All attorneys of LEAH B. GUILBEAU & ASSOCIATES are employees of the Corporate Law Department of STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY.

Respectfully submitted:

LEAH B. GUILBEAU & ASSOCIATES

By: L.B. Guilbeau  
*Fors*

L. Bianca Chretien  
Bar No. 29123  
Caffery Plaza, Suite 100  
4023 Ambassador Caffery Parkway  
Lafayette, Louisiana 70503  
Telephone: (337) 988-7240  
Attorney for defendant, State Farm Mutual  
Automobile Insurance Company

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon all counsel of record by placing same in the United States mail, postage prepaid and properly addressed, this 18<sup>th</sup> day of May, 2016.

L.B. Guilbeau  
*Fors* L. Bianca Chretien  
Bar Roll Number 29123

ORIGINAL

BRENON D. HUDSON, ET AL

VERSUS

MICHAEL DALE GREENE, ET AL

12TH JUDICIAL DISTRICT COURT  
DOCKET NO: 20162965  
2016 MAY 23 AM 10 00

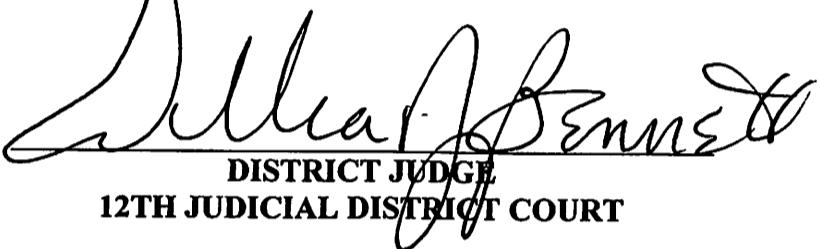
FILE NO         
PARISH OF AVOYELLES ~~FILED AND RECORDED~~

\* \* \* \* \*

ORDER

LET this cause be tried by jury upon the Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, furnishing bond with good and solvent surety conditioned as the law directs in the amount of Three thousand (\$3 000.00) Dollars to cover the additional costs of the jury herein. Said bond to be posted within the delays provided by law and/or rules of this court.

Marksville, Louisiana, this 23 day of May, 2016.

  
DISTRICT JUDGE

12TH JUDICIAL DISTRICT COURT

COPY(S) 2  
SENT: S-23-14  
BY: CA2  
TO:

Derrick Earles

Bianca Christian

LAW OFFICES CLERK AND RECORDER  
**PLAUCHÉ, SMITH & NIESET, L.L.C.**  
 AVOYELLES PARISH LA

JAMES R. NIESET \*  
 FRANK M. WALKER, JR.  
 MICHAEL J. MCNULTY, III \*  
 JEFFREY M. COLE  
 CHARLES V. MUSSO, JR.  
 CHRISTOPHER P. IEYOUN  
 H. DAVID VAUGHAN, II  
 JOSEPH R. POUSSON, JR.  
 V. ED MCGUIRE, III  
 ERIC W. ROAN  
 SAMUEL B. GABB  
 KENDRICK J. GUIDRY  
 MICHAEL J. WILLIAMSON  
 WESLEY A. ROMERO  
 KYLE M. BEASLEY \*\*  
 ASHLEY D. BOUTTE \*\*

A LIMITED LIABILITY COMPANY 2 AT 10 17 S.W. PLAUCHÉ (1889-1952)  
 1123 PITHON STREET S.W. PLAUCHÉ, JR. (1915-1966)  
 LAKE CHARLES, LOUISIANA 70601 A. LANE PLAUCHÉ (1919-2006)  
 FILE NO. *(initials)* ALLEN L. SMITH, JR. (1936-2015)

FILED AND RECORDED

P.O. DRAWER 1705  
 LAKE CHARLES, LA 70602(337) 436-0522  
 FAX (337) 436-9637  
[www.psnlaw.com](http://www.psnlaw.com)

May 27, 2016

\* Of Counsel  
 \*\*also admitted in New York  
 Email: eroan@psnlaw.com

Honorable Connie B. Couvillion, Clerk of Court  
 12<sup>th</sup> JDC, Avoyelles Parish  
 312 North Main Street  
 Marksville, LA 71351

**RE:** *Brenon D. Hudson and Amanda L. Jacobs  
 vs. Michael Dale Greene, et al  
 Docket No. 2016-2965B, 12<sup>th</sup> JDC*

Dear Ms. Couvillion:

Enclosed for filing please find the following documents on behalf of defendants, Michael Dale Greene and Redneck, Inc., to-wit:

- 1) An original and one copy of an Answer to Petition for Damages;
- 2) An original and one copy of a Request for Written Notice; and
- 3) An original and one copy of an Order.

I would ask that the Order be presented to the appropriate Judge for review and execution. Thereafter, please file the above-listed pleadings into the record of this matter. I would also ask that you conform the extra copies of the pleadings provided herewith and return same to my office in the enclosed self-addressed stamped envelope.

By copy of this letter, I am providing same to all known counsel of record.

Thank you for your usual courtesies. If any additional information is needed, please do not hesitate to contact my office.

Sincerely,

*Eric W. Roan*  
 ERIC W. ROAN

EWR/hv  
 ~ enclosures  
 cc: Derrick G. Earles

CLERK AND RECORDER  
AVOYELLES PARISH LA

ORIGINAL

2016 JUN 2 AM 10 17

FILE NO. *[Signature]*  
FILED AND RECORDED

BRENON D. HUDSON and  
AMANDA L. JACOBS

: 12<sup>TH</sup> JUDICIAL DISTRICT COURT

VS. NO. 20162965 DIV. B

: PARISH OF AVOYELLES

MICHAEL DALE GREENE, REDNECK,  
INC., NATIONAL UNION FIRE INS. CO.  
OF PITTSBURGH, PA, and STATE FARM  
MUTUAL AUTOMOBILE INS. CO.

: STATE OF LOUISIANA

FILED: June 2, 2016

Cynthia Roblin

DEPUTY CLERK

### ANSWER TO PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes REDNECK, INC. and MICHAEL DALE GREENE, who for answer to the allegations of the Petition for Damages of plaintiffs, BRENON D. HUDSON and AMANDA L. JACOBS, denying each and every allegation contained therein, except those which are hereinafter and specifically admitted.

Further answering, categorically specific allegations of the Petition for Damages, the appearing defendants plead as follows:

1.

The allegations of Paragraph No. 1 of plaintiffs' Petition for Damages are denied except to admit that Redneck, Inc. and Michael Dale Greene have been made defendants herein.

2.

The allegations of Paragraph No. 2 of plaintiffs' Petition for Damages state are denied.

3.

The allegations of Paragraph No. 3 of plaintiffs' Petition for Damages are denied for lack of sufficient information to justify a belief therein.

4.

The allegations of Paragraph No. 4 of plaintiffs' Petition for Damages are denied for lack of sufficient information to justify a belief therein.

5.

The allegations of Paragraph No. 5 of plaintiffs' Petition for Damages are admitted, except to deny the allegations as to liability or responsibility of defendants.

1  
*S*

6.

The allegations of Paragraph No. 6 of plaintiffs' Petition for Damages are denied for lack of sufficient information to justify a belief therein.

7.

The allegations of Paragraph No. 7 of plaintiffs' Petition for Damages are denied for lack of sufficient information to justify a belief therein.

8.

The allegations of Paragraph No. 8 of plaintiffs' Petition for Damages are denied for lack of sufficient information to justify a belief therein.

9.

The allegations of Paragraph No. 9 of plaintiffs' Petition for Damages are denied for lack of sufficient information to justify a belief therein.

10.

The allegations of Paragraph No. 10 of plaintiffs' Petition for Damages are denied.

11.

The allegations of Paragraph No. 11 of plaintiffs' Petition for Damages are denied.

12.

The allegations of Paragraph No. 12 of plaintiffs' Petition for Damages are denied except to admit that National Union Fire Insurance Company of Pittsburgh, PA issued a policy of insurance in favor of Redneck, Inc. averring that the policy is in writing and is the best evidence of its contents. Defendants specifically deny all the allegations of Paragraph No. 12 of plaintiffs' Petition for Damages in conflict with the policy and put plaintiff on notice of the existence of the National Union Fire Insurance Company of Pittsburgh, PA policy and specifically plead all the terms, conditions, exclusions, and limitations of the policy.

13.

The allegations of Paragraph No. 13 of plaintiffs' Petition for Damages require no answer of appearing defendants. If an answer is deemed necessary, then the allegations of Paragraph No. 13 of plaintiffs' Petition for Damages are denied for lack of sufficient information to justify a belief therein.

\* \* \* \* \*

AND NOW, AND FURTHER ANSWERING, **REDNECK, INC. and MICHAEL DALE GREENE**, state as follows:

14.

The sole and proximate cause of the accident made the basis of this litigation and any resulting damages complained of by plaintiffs was due to the negligence and legal fault of Brenon D. Hudson and/or Amanda L. Jacobs which negligence and legal fault consists of the following non-exclusive listed acts:

- a) Failing to maintain a proper look out;
- b) Failing to use reasonable care and caution;
- c) Failing to see what he/she should have seen; and
- d) Any other acts that may be proven at the trial of this matter.

14.

Plaintiffs have failed to mitigate their damages.

15.

Should defendants have any liability (which is denied), they are entitled to and, hereby request, a credit and/or set-off of any Medicaid discounts and/or adjustments pursuant to *Bozeman v. State of Louisiana*, 879 So.2d 692, 2003-1016 (La. 07/02/04).

16.

Defendants request trial by jury on all issues in this matter.

\* \* \* \* \*

WHEREFORE, premises considered, defendants, **REDNECK, INC. and MICHAEL DALE GREENE**, pray that;

- 1) This Answer be deemed good and sufficient;
- 2) After due proceedings had and trial thereof, that there be judgment in favor of defendants, **REDNECK, INC. and MICHAEL DALE GREENE**, and against plaintiffs, **BRENON D. HUDSON and AMANDA L. JACOBS**, dismissing their demand at their cost;
- 3) All issues in this matter be tried by jury; and
- 4) For all Orders and Decrees necessary in the premises, for full, general, and equitable relief.

Respectfully submitted,

PLAUCHÉ, SMITH & NIESET  
A Limited Liability Company

  
ERIC W. ROAN (#22568)  
1123 Pithon Street (70601)  
Post Office Drawer 1705  
Lake Charles, LA 70602  
Tel (337) 436-0522  
Fax (337) 436-9637  
Attorney for:  
Redneck, Inc., and Michael  
Dale Greene

**C E R T I F I C A T E**

I HEREBY CERTIFY that a copy of the foregoing has this day been forwarded by United States mail, postage prepaid and properly addressed to all counsel of record.

Lake Charles, Louisiana, this 21 day of May, 2016.

  
ERIC W. ROAN

BRENON D. HUDSON and : 12<sup>TH</sup> JUDICIAL DISTRICT COURT  
AMANDA L. JACOBS

VS. NO. 20162965 DIV. B : PARISH OF AVOYELLES

MICHAEL DALE GREENE, REDNECK, : STATE OF LOUISIANA  
INC., NATIONAL UNION FIRE INS. CO.  
OF PITTSBURGH, PA, and STATE FARM  
MUTUAL AUTOMOBILE INS. CO.

FILED: June 2, 2014 : Cynthia Bellis  
DEPUTY CLERK

**REQUEST FOR WRITTEN NOTICE**

TO: **HON. H. LYNN JONES, II**  
Clerk of Court, Calcasieu Parish  
1000 Ryan Street  
Lake Charles, LA 70601

In accordance with the provisions of Articles 1571 and 1572 of the Louisiana Code of Civil Procedure, you are hereby requested to give us, as counsel for defendants, **REDNECK, INC.** and **MICHAEL DALE GREENE**, in the above numbered and entitled cause, written notice, by mail, ten (10) days in advance of any date fixed for any trial or hearing of the case, whether on exception, rules or the merits thereof.

And in accordance with the provisions of Articles 1913 and 1914 of the Louisiana Code of Civil Procedure, you are hereby additionally requested to send us immediate notice of any order or judgment made or rendered in this case upon the entry of any such order or judgment.

Respectfully submitted,

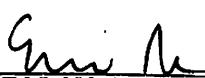
PLAUCHÉ, SMITH & NIESET  
(A Limited Liability Company)

*Eric W. Roan*  
\_\_\_\_\_  
**ERIC W. ROAN (#22568)**  
1123 Pithon Street (70601)  
Post Office Drawer 1705  
Lake Charles, LA 70602  
Tel (337) 436-0522  
Fax (337) 436-9637

**C E R T I F I C A T E**

I HEREBY CERTIFY that a copy of the foregoing has this day been forwarded by United States mail, postage prepaid and properly addressed to all counsel of record.

Lake Charles, Louisiana, this 21 day of May, 2016.

  
\_\_\_\_\_  
ERIC W. ROAN

+ 3 (ME)

BRENON D. HUDSON and : 12<sup>TH</sup> JUDICIAL DISTRICT COURT  
AMANDA L. JACOBS

VS. NO. 20162965 DIV. B : PARISH OF AVOYELLES

MICHAEL DALE GREENE, REDNECK, : STATE OF LOUISIANA  
INC., NATIONAL UNION FIRE INS. CO.  
OF PITTSBURGH, PA, and STATE FARM  
MUTUAL AUTOMOBILE INS. CO.

FILED: June 2, 2016 : Cynthia L. Obis  
DEPUTY CLERK

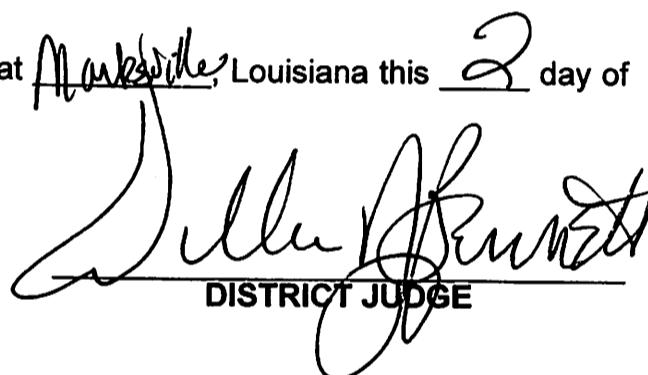
**O R D E R**

Considering the foregoing Answer;

**Let the above case be tried by jury as prayed for according to law;**

IT IS FURTHER ORDERED that the bond for cost of the jury, as provided by law,  
is hereby fixed at \$3,600.00.

DONE AND SIGNED in Chambers, at Marksville, Louisiana this 2 day of  
JUNE, 2016.

  
Diller Bennett  
DISTRICT JUDGE

COPY(S) 3  
SENT: 6-2-16  
BY: CAR  
TO:  
Derrick Eavles  
Eric Roan  
Bianca Chretien